

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Section 73.622, Digital Television Table of Allotments For KNOE-TV, Monroe, Louisiana (Facility 48975)	)	MB Docket No. _____ Rulemaking No. _____

To: Office of the Secretary, Federal Communications Commission  
Attn: Chief, Media Bureau

**PETITION FOR RULEMAKING**

Gray Television Licensee, LLC (“Gray”), licensee of full power commercial television station KNOE-TV (“KNOE”), Monroe, Louisiana, hereby requests that the Commission institute a rulemaking proceeding for the purpose of amending the DTV Table of Allotments (the “DTV Table”) contained in Section 73.622(i) of the Commission’s rules.<sup>1</sup> Gray requests that the Commission amend the DTV Table to substitute UHF Channel 24 for VHF Channel 8 with the technical parameters as set forth in the attached Engineering Statement. As set forth herein, grant of this Petition will create a preferential arrangement of allotments by expanding the availability of free over-the-air television service in this market.

The FCC has described the goal of the DTV Table as ensuring the provision of digital television service “to the American people in an expeditious and efficient manner.”<sup>2</sup> In considering channel substitution requests, the Commission considers the

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<sup>1</sup> See 47 C.F.R. §§ 1.401, 1.420, and 73.622(i).

<sup>2</sup> See, e.g., *Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations. (Nampa, Idaho)*, Report and Order, 19 FCC Rcd. 4491, ¶ 6 (2004); *Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations. (Albany, New York)*, 19 FCC Rcd. 4329, ¶ 7 (2004); see also *Advanced*

petitioner's public interest justification and whether the proposal would comply with the principal community coverage requirements of Section 73.625(a).<sup>3</sup>

This channel substitution serves the public interest because it will resolve significant over-the-air ("OTA") reception problems in KNOE's existing service area.<sup>4</sup> With viewers increasingly reliant on OTA signals to receive the most valued video content,<sup>5</sup> providing a strong broadcast signal is more important than it has been in decades. Yet, the challenges with digital reception of VHF signals are well-documented. Ten years ago, the Commission recognized the deleterious effects manmade noise has on the reception of VHF signals, finding that "the propagation characteristics of these

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*Television Systems & Their Impact Upon the Existing Television Broadcast Service*, 12 FCC Rcd. 14588, ¶ 76 (1997).

<sup>3</sup> See, e.g., *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Mesa, Arizona)*, Notice of Proposed Rulemaking, 35 FCC Rcd. 11400, ¶ 7 (2020) ("*Mesa NPRM*"); *Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations. (Ontario, California)*, Notice of Proposed Rulemaking, 16 FCC Rcd. 2276, ¶ 3 (2001); *Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations; and Section 73.622(b), Table of Allotments, Digital Broadcast Stations. (Moscow, Idaho)*, Notice of Proposed Rulemaking, 17 FCC Rcd. 19447, ¶ 3 (2002).

<sup>4</sup> See *Mesa NPRM* at ¶ 6 (recognizing effect of "VHF propagation challenges"); *Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations. (Missoula, Montana)*, Notice of Proposed Rulemaking, 16 FCC Rcd. 2232, ¶¶ 2-3 (2001) (finding that proposal to substitute channels to improve signal coverage and eliminate interference "warrants consideration.").

<sup>5</sup> See, e.g., Parks Associates, *TV Antenna Usage in US Broadband Households Jumped to 25% in 2019 and Is Expected to Grow More as COVID-19 Keeps Consumers at Home* (Mar. 26, 2020), available at <http://www.parksassociates.com/blog/article/pr-02762020> (finding that OTA viewing increased from 15% in 2018 to 25% in 2019); Phil Kurz, TVTechnology, *New Research Reveals Resurgence in OTA Antenna Viewing* (Apr. 29, 2019), available at <https://www.tvtechnology.com/news/new-research-reveals-resurgence-in-ota-antenna-viewing> (finding that viewers consume 19% of viewing time over the air); Nielsen Local Watch Report, *The Evolving Over-the-Air Home* (Jan. 14, 2019), available at <https://www.nielsen.com/wp-content/uploads/sites/3/2019/04/q2-2018-local-watch-report.pdf> (finding that more than 14% of TV households lack cable or satellite service).

channels allow undesired signals and noise to be receivable at relatively farther distances, nearby electrical devices tend[] to emit noise in this band that can cause interference, and reception of VHF signals requires physically larger antennas ... relative to UHF channels.”<sup>6</sup> The Commission also observed the “large variability in the performance (especially intrinsic gain) of indoor antennas available to consumers, with most antennas receiving fairly well at UHF and the substantial majority not so well to very poor at high-VHF.”<sup>7</sup>

Attached is an Engineering Statement of Chesapeake RF Consultants, LLC,<sup>8</sup> which sets forth in detail the proposed KNOE Channel 24 DTV Table specifications. This proposal is in compliance with all relevant technical requirements for amendment of the post-transition DTV Table, including the interference protection requirements of 47 C.F.R. § 73.616 and the 0.5% *de minimis* interference standard with respect to all allotments and assignments, existing and proposed. The proposed Channel 24 facilities will provide full principal community coverage to Monroe, Louisiana.

The proposed Channel 24 facilities’ noise limited service contour (“NLSC”) will extend slightly beyond that of KNOE’s currently licensed Channel 8 facilities. Therefore, the substitution of Channel 24 for Channel 8 will not create any loss area. Rather, the proposed Channel 24 NLSC will encompass a total population of 745,289 persons, which

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<sup>6</sup> See *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, Notice of Proposed Rulemaking, 25 FCC Rcd. 16498, ¶ 42 (2010) (recognizing that “VHF channels have certain characteristics that have posed challenges for their use in providing digital television service.”)

<sup>7</sup> *Id.* at ¶ 44.

<sup>8</sup> See Exhibit 1.

reflects an increase of 12,868 persons, or 1.76%, from the 732,421 persons that are currently encompassed by Channel 8's NLSC.

For the foregoing reasons, Gray respectfully requests that the Commission grant this Petition and immediately commence a rulemaking proceeding to change the digital allotment for KNOE from Channel 8 to Channel 24 as proposed herein.

Respectfully submitted,

GRAY TELEVISION LICENSEE, LLC

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Dated: September 1, 2021

Exhibit 1

## **Engineering Statement**

prepared for

### **Gray Television Licensee, LLC**

KNOE-TV Monroe, LA

Facility ID 48975

Ch. 24 1000 kW 579 m

This engineering statement has been prepared on behalf of *Gray Television Licensee, LLC* (“*Gray*”), licensee of KNOE-TV (Facility ID 48975, Monroe LA) in support of a *Petition for Rulemaking* to amend §73.622(i) by changing KNOE-TV’s digital television channel assignment. KNOE-TV is licensed to operate on Channel 8 (file# BLCDDT-20090223ABC). As described herein, *Gray* requests substitution of Channel 24 in lieu of Channel 8 for KNOE-TV.

The KNOE-TV Channel 8 facility is in the VHF spectrum and has proven to be ineffective for satisfactory viewer reception as discussed herein and elsewhere in the petition. The use of Channel 24 would place KNOE-TV in the UHF spectrum which is known to provide robust signal levels for home reception.

*Gray* has determined that many viewers experience significant difficulty in receiving KNOE-TV’s signal. Problems with digital VHF reception by stations in many markets were widely publicized since the 2009 digital transition date. It has been established that indoor reception is difficult for digital VHF stations such as KNOE-TV due to the longer wavelength signal’s inability to readily pass through buildings (the windows are smaller than the wavelength size), the ineffectiveness of many indoor antennas many of which were designed to emphasize the shorter wavelengths for UHF reception, and high levels of manmade and environmental noise.

No change in transmitting location is proposed. The KNOE-TV tower structure corresponds to FCC Antenna Structure Registration (“ASR”) number 1040625. *Gray* proposes to implement the Channel 24 substitution with a top-mounted transmitting antenna on the existing tower structure which would replace the existing top-mounted Channel 8 antenna.

The licensed Channel 8 facility operates with 22.3 kW effective radiated power (“ERP”) nondirectional at 576 meters antenna height above average terrain (“HAAT”). *Gray* proposes herein to utilize 1000 kW ERP nondirectional on Channel 24 at 579 meters antenna HAAT.<sup>1</sup>

A summary of the licensed Channel 8 and proposed Channel 24 technical parameters is provided in the following.

**Licensed Channel 8 Parameters (file# BLCDDT-20090223ABC)**

FacID	Call	Ch	City	St	Lat	Lon	RCAMSL	HAAT	ERP	DA
48975	KNOE-TV	8	MONROE	LA	321151	920414	604.3	576	22.3	ND

**Proposed Channel 24 Parameters**

FacID	Call	Ch	City	St	Lat	Lon	RCAMSL	HAAT	ERP	DA
48975	KNOE-TV	24	MONROE	LA	321151	920414	604.3	578.8	1000	ND

A map is supplied as Figure 1, which depicts the standard predicted coverage contours. As demonstrated thereon, the proposed facility complies with §73.625(a)(1) as the entire community of Monroe will be encompassed by the 48 dBμ contour.

Interference study per FCC OET Bulletin 69<sup>2</sup> shows that the proposal complies with the 0.5 percent limit of new interference caused to pertinent nearby full service and Class A television stations as required by §73.616. The interference study output report is provided as Table 1. FCC processing of this proposal is requested using a 2.0 km cell size and 0.5 km terrain profile increment.

The proposed 1000 kW ERP exceeds the maximum allowed for the proposed antenna HAAT of 579 meters permitted by §73.622(f)(8)(i). Section 73.622(f)(5) permits the maximum

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<sup>1</sup>The antenna height above ground and above mean sea level are unchanged from licensed values. The antenna HAAT is recalculated to be 578.8 meters, based on FCC 30 meter terrain data developed by OET.

<sup>2</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”). This analysis employed the FCC’s current “TVStudy” software with the default application processing template settings, 2 km cell size, and 1 km terrain increment. Comparisons of various results of this computer program (run on a Mac processor) to the FCC’s implementation of TVStudy show excellent correlation.

ERP to be exceeded in order to provide the same geographic coverage area as the largest station within the same market. As demonstrated in Figure 2, the total area within the proposed KNOE-TV Channel 24 noise limited service contour (“NLSC”) is 44,873 square kilometers, which does not exceed the NLSC area of the KNOE-TV Channel 8 facility authorized by Construction Permit file # 0000127680 (34.2 kW ERP, 47,278 sq. km). Thus, the 1000 kW ERP specified herein complies with §73.622(f)(5) of the FCC’s Rules.

Figure 2 also shows that the proposed KNOE-TV Channel 24 NLSC extends slightly beyond that of the licensed KNOE-TV Channel 8 facility (file# BLCDT-20090223ABC, 22.3 kW ERP). Thus, no area of NLSC loss will be created. The proposed Channel 24 NLSC encompasses a total population of 745,289 persons, which is an increase of 12,868 persons (1.76 percent) from the 732,421 population within the licensed Channel 8 NLSC.

### **Conclusion**

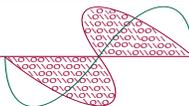
The proposed channel substitution complies with the FCC’s principal community coverage requirements of §73.625 and the interference protection requirements of §73.616. No NLSC loss area will be created.

### List of Attachments

Figure 1	Proposed Coverage Contours
Figure 2	Coverage Contour Comparison
Table 1	TVStudy Analysis of Proposal

### **Chesapeake RF Consultants, LLC**

Joseph M. Davis, P.E.                      August 6, 2021  
207 Old Dominion Road                      Yorktown, VA 23692                      703-650-9600



**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

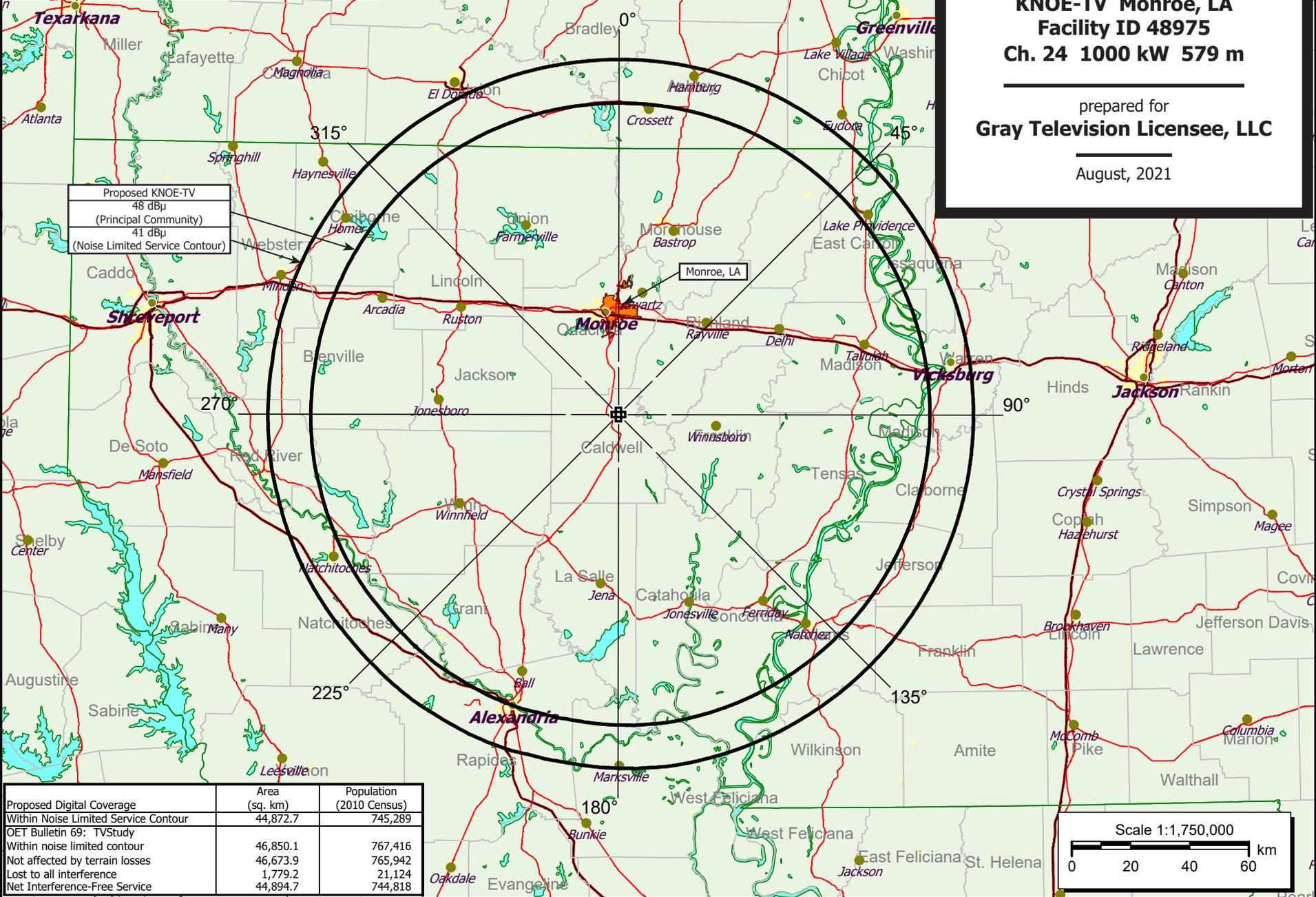
**Figure 1**  
**Proposed Coverage Contours**  
**KNOE-TV Monroe, LA**  
**Facility ID 48975**  
**Ch. 24 1000 kW 579 m**

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prepared for  
**Gray Television Licensee, LLC**

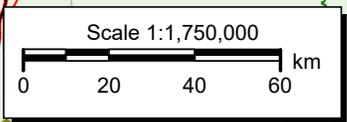
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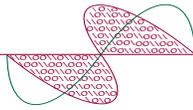
August, 2021



Proposed KNOE-TV  
48 dBu  
(Principal Community)  
41 dBu  
(Noise Limited Service Contour)

Proposed Digital Coverage	Area (sq. km)	Population (2010 Census)
Within Noise Limited Service Contour	44,872.7	745,289
OET Bulletin 69: TVStudy		
Within noise limited contour	46,850.1	767,416
Not affected by terrain losses	46,673.9	765,942
Lost to all interference	1,779.2	21,124
Net Interference-Free Service	44,894.7	744,818

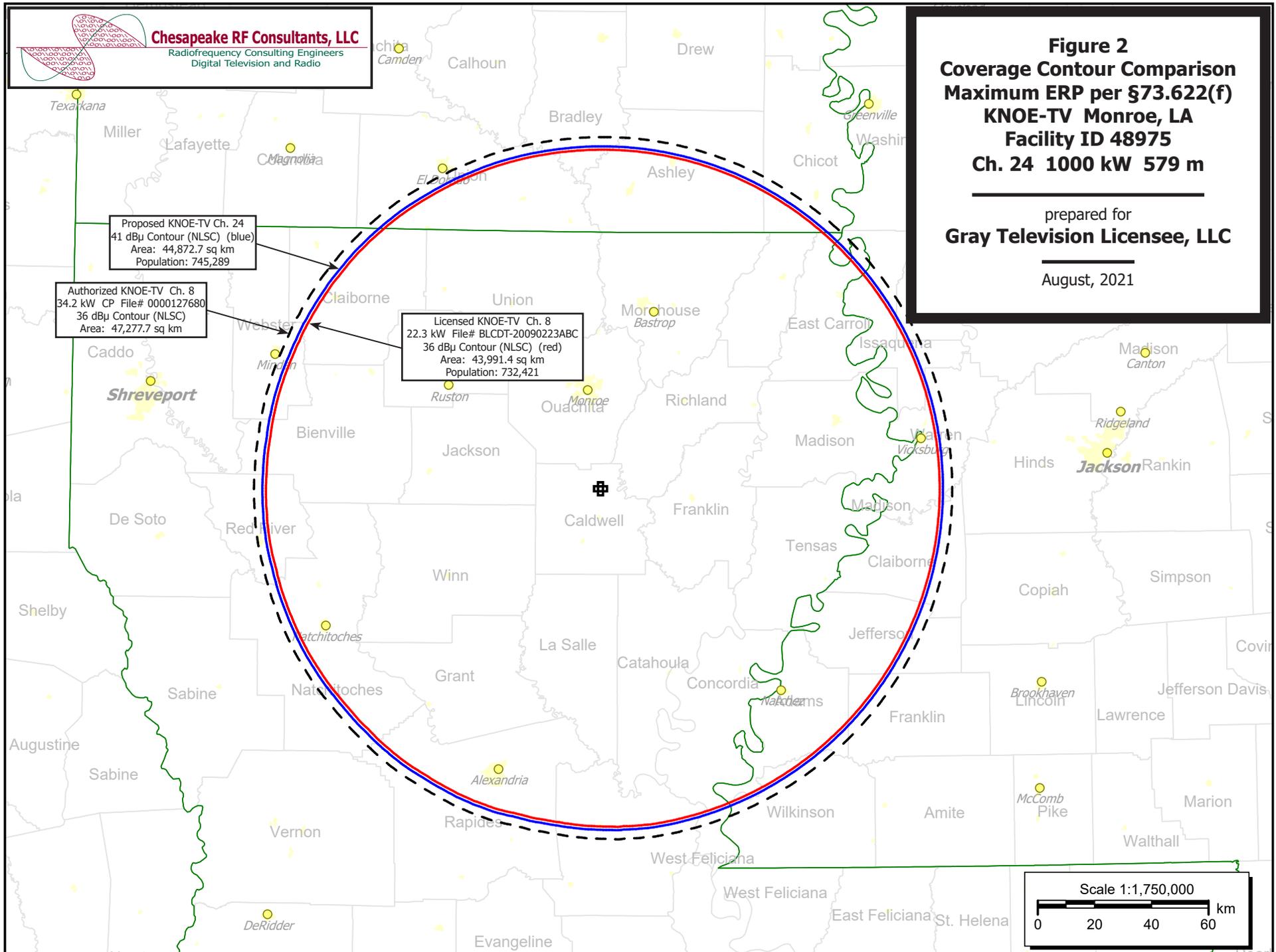




**Chesapeake RF Consultants, LLC**  
 Radiofrequency Consulting Engineers  
 Digital Television and Radio

**Figure 2**  
**Coverage Contour Comparison**  
**Maximum ERP per §73.622(f)**  
**KNOE-TV Monroe, LA**  
**Facility ID 48975**  
**Ch. 24 1000 kW 579 m**

prepared for  
**Gray Television Licensee, LLC**  
 August, 2021



**Table 1 KNOE-TV TVStudy Analysis of Proposal**  
 (page 1 of 5)



tvstudy v2.2.5 (4uoc83)  
 Database: localhost, Study: KNOE-TV 24\_PRM, Model: Longley-Rice  
 Start: 2021.08.05 15:35:16

Study created: 2021.08.05 15:34:32

Study build station data: LMS TV 2021-08-05

Proposal: KNOE-TV D24 DT APP MONROE, LA  
 File number: KNOE-TV 24 PRM  
 Facility ID: 48975  
 Station data: User record  
 Record ID: 3792  
 Country: U.S.  
 Zone: II

Search options:  
 Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	KLPB-TV	D23	DT	LIC	LAFAYETTE, LA	BLEDT20130820AAH	209.4 km
Yes	KSLA	D23	DT	LIC	SHREVEPORT, LA	BLANK0000120697	182.6
No	WWJX	D23	DT	LIC	JACKSON, MS	BLCDT20110824ABD	163.7
Yes	KVTN-DT	D24	DT	LIC	PINE BLUFF, AR	BLCDT20071231AFB	259.5
No	WSRE	D24	DT	LIC	PENSACOLA, FL	BLANK0000090765	458.6
Yes	WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	221.2
No	KFAM-CD	D24	DC	LIC	LAKE CHARLES, LA	BLANK0000063954	249.3
No	W39CA-D	D24	DC	LIC	FULTON, MS	BLANK0000063965	410.6
Yes	WMDN	D24	DT	CP	MERIDIAN, MS	BLANK0000035927	317.9
Yes	WMDN	D24	DT	LIC	MERIDIAN, MS	BLCDT20090304ADW	317.9
No	KXAS-TV	D24	DT	LIC	FORT WORTH, TX	BLANK0000054717	461.7
No	KETH-TV	D24	DT	LIC	HOUSTON, TX	BLEDT20101019ABX	439.1
No	WLPB-TV	D25	DT	CP	BATON ROUGE, LA	BLANK0000035855	218.8
No	WLPB-TV	D25	DT	LIC	BATON ROUGE, LA	BLEDT20101201ALR	218.8
No	WMAO-TV	D25	DT	LIC	GREENWOOD, MS	BLEDT20090612AAI	193.8

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D24  
 Latitude: 32 11 51.00 N (NAD83)  
 Longitude: 92 4 14.00 W  
 Height AMSL: 604.3 m  
 HAAT: 578.8 m  
 Peak ERP: 1000 kW  
 Antenna: Omnidirectional  
 Elev Pattn: Generic  
 Elec Tilt: 0.75

39.8 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	1000 kW	585.8 m	122.6 km
45.0	1000	585.7	122.6
90.0	1000	586.7	122.7
135.0	1000	587.3	122.7
180.0	1000	577.3	122.1
225.0	1000	561.5	121.1
270.0	1000	564.1	121.3
315.0	1000	582.0	122.4

ERP exceeds maximum  
 ERP: 1000 kW ERP maximum: 352 kW

Distance to Canadian border: 1337.0 km

Distance to Mexican border: 836.7 km

Conditions at FCC monitoring station: Powder Springs GA

**Table 1 KNOE-TV TVStudy Analysis of Proposal**  
(page 2 of 5)



Bearing: 72.9 degrees Distance: 709.0 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
Bearing: 310.5 degrees Distance: 1470.0 km

Study cell size: 2.00 km  
Profile point spacing: 0.50 km

Maximum new IX to full-service and Class A: 0.50%  
Maximum new IX to LPTV: 2.00%

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Interference to BLANK0000120697 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KSLA	D23	DT	LIC	SHREVEPORT, LA	BLANK0000120697	
Undesireds:	KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	182.6 km
	KETK-TV	D22	DT	LIC	JACKSONVILLE, TX	BMLCDT20120516ABW	146.5
	KLPB-TV	D23	DT	LIC	LAFAYETTE, LA	BLEDT20130820AAH	304.7
	KLTJ	D23	DT	LIC	GALVESTON, TX	BLEDT20110127ACD	376.2
	KTXD-TV	D23	DT	LIC	GREENVILLE, TX	BLANK0000080284	284.4
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	34525.4	1,017,556	34400.7	1,016,380	33734.0	994,135	33601.1 993,699 0.39 0.04
Undesired			Total IX		Unique IX, before	Unique IX, after	
	KNOE-TV D24 DT APP		157.1	529		132.9	436
	KETK-TV D22 DT LIC		177.3	13,348	100.8	8,350	100.8 8,350
	KLPB-TV D23 DT LIC		52.4	177	48.4	163	24.2 70
	KLTJ D23 DT LIC		4.1	14	0.0	0	0.0 0
	KTXD-TV D23 DT LIC		513.4	13,718	437.0	8,720	437.0 8,720

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Interference to BLCDT20071231AFB LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KVTN-DT	D24	DT	LIC	PINE BLUFF, AR	BLCDT20071231AFB	
Undesireds:	KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	259.5 km
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	24887.3	936,328	24310.6	923,515	24310.6	923,515	23896.9 919,105 1.70 0.48
Undesired			Total IX		Unique IX, before	Unique IX, after	
	KNOE-TV D24 DT APP		413.7	4,410		413.7	4,410

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Interference to BLANK0000113571 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	
Undesireds:	KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	221.2 km
	KLPB-TV	D23	DT	LIC	LAFAYETTE, LA	BLEDT20130820AAH	96.6
	WMDN	D24	DT	CP	MERIDIAN, MS	BLANK0000035927	331.2
	WLPB-TV	D25	DT	CP	BATON ROUGE, LA	BLANK0000035855	8.6
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	30416.5	1,742,708	30364.8	1,742,642	30313.1	1,742,440	29198.9 1,736,109 3.68 0.36
Undesired			Total IX		Unique IX, before	Unique IX, after	
	KNOE-TV D24 DT APP		1157.9	6,533		1114.1	6,331
	KLPB-TV D23 DT LIC		4.0	0	4.0	0	4.0 0
	WMDN D24 DT CP		47.7	202	47.7	202	4.0 0

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Interference to BLANK0000113571 LIC scenario 2

**Table 1 KNOE-TV TVStudy Analysis of Proposal**  
(page 3 of 5)



Call	Chan	Svc	Status	City, State	File Number	Distance			
Desired: WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571				
Undesireds: KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	221.2 km			
KLPB-TV	D23	DT	LIC	LAFAYETTE, LA	BLEDT20130820AAH	96.6			
WMDN	D24	DT	LIC	MERIDIAN, MS	BLCDT20090304ADW	331.2			
WLPB-TV	D25	DT	CP	BATON ROUGE, LA	BLANK0000035855	8.6			
Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX					
30416.5	1,742,708	30364.8	1,742,642	30333.0	1,742,549	29198.9	1,736,109	3.74	0.37
Undesired	Total IX	Unique IX, before	Unique IX, after						
KNOE-TV D24 DT APP	1157.9	6,533	1134.0	6,440					
KLPB-TV D23 DT LIC	4.0	0	4.0	0					
WMDN D24 DT LIC	27.8	93	27.8	93	4.0	0			

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Interference to BLANK0000035927 CP scenario 1

Call	Chan	Svc	Status	City, State	File Number	Distance			
Desired: WMDN	D24	DT	CP	MERIDIAN, MS	BLANK0000035927				
Undesireds: KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	317.9 km			
WBXA-CD	D24	DC	LIC	BIRMINGHAM, AL	BLANK0000001638	217.9			
WHIQ	D24	DT	LIC	HUNTSVILLE, AL	BLANK0000004828	334.4			
WSRE	D24	DT	LIC	PENSACOLA, FL	BLANK00000090765	216.7			
WXTX	D24	DT	LIC	COLUMBUS, GA	BLANK00000064021	358.2			
WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	331.2			
W39CA-D	D24	DC	LIC	FULTON, MS	BLANK00000063965	196.5			
Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX					
22288.9	308,324	22139.6	307,574	22023.3	306,782	21938.7	305,942	0.38	0.27
Undesired	Total IX	Unique IX, before	Unique IX, after						
KNOE-TV D24 DT APP	104.7	1,084	84.5	840					
WBXA-CD D24 DC LIC	4.0	2	0.0	0					
WHIQ D24 DT LIC	20.0	31	16.0	31	16.0	31			
WSRE D24 DT LIC	68.2	245	60.2	243	56.2	230			
WXTX D24 DT LIC	4.0	2	0.0	0	0.0	0			
WGMB-TV D24 DT LIC	20.2	363	20.2	363	4.0	132			
W39CA-D D24 DC LIC	16.0	153	12.0	153	12.0	153			

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Interference to BLANK0000035927 CP scenario 2

Call	Chan	Svc	Status	City, State	File Number	Distance			
Desired: WMDN	D24	DT	CP	MERIDIAN, MS	BLANK0000035927				
Undesireds: KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	317.9 km			
WBXA-CD	D24	DC	CP	BIRMINGHAM, AL	BLANK0000035776	217.9			
WHIQ	D24	DT	LIC	HUNTSVILLE, AL	BLANK0000004828	334.4			
WSRE	D24	DT	LIC	PENSACOLA, FL	BLANK00000090765	216.7			
WXTX	D24	DT	LIC	COLUMBUS, GA	BLANK00000064021	358.2			
WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	331.2			
W39CA-D	D24	DC	LIC	FULTON, MS	BLANK00000063965	196.5			
Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX					
22288.9	308,324	22139.6	307,574	22023.3	306,782	21938.7	305,942	0.38	0.27
Undesired	Total IX	Unique IX, before	Unique IX, after						
KNOE-TV D24 DT APP	104.7	1,084	84.5	840					
WBXA-CD D24 DC CP	4.0	2	0.0	0					
WHIQ D24 DT LIC	20.0	31	16.0	31	16.0	31			
WSRE D24 DT LIC	68.2	245	60.2	243	56.2	230			
WXTX D24 DT LIC	4.0	2	0.0	0	0.0	0			
WGMB-TV D24 DT LIC	20.2	363	20.2	363	4.0	132			
W39CA-D D24 DC LIC	16.0	153	12.0	153	12.0	153			

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Interference to BLCDT20090304ADW LIC scenario 1

Call	Chan	Svc	Status	City, State	File Number	Distance
Desired: WMDN	D24	DT	LIC	MERIDIAN, MS	BLCDT20090304ADW	

**Table 1 KNOE-TV TVStudy Analysis of Proposal**  
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Undesireds:	KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	317.9	km
	WBXA-CD	D24	DC	LIC	BIRMINGHAM, AL	BLANK0000001638	217.9	
	WHIQ	D24	DT	LIC	HUNTSVILLE, AL	BLANK0000004828	334.4	
	WSRE	D24	DT	LIC	PENSACOLA, FL	BLANK0000090765	216.7	
	WXTX	D24	DT	LIC	COLUMBUS, GA	BLANK0000064021	358.2	
	WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	331.2	
	W39CA-D	D24	DC	LIC	FULTON, MS	BLANK0000063965	196.5	

	Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX
	20490.7	278,227	20394.1	277,828	20309.8	277,503	20273.7	277,101	0.18 0.14

Undesired				Total IX	Unique IX, before	Unique IX, after
KNOE-TV D24 DT APP	44.2			528		36.2 402
WBXA-CD D24 DC LIC	4.0			0	0.0 0	0.0 0
WHIQ D24 DT LIC	28.0			30	0.0 0	0.0 0
WSRE D24 DT LIC	68.2			269	48.2 239	44.2 144
WXTX D24 DT LIC	4.0			0	0.0 0	0.0 0
WGMB-TV D24 DT LIC	4.1			31	4.1 31	0.0 0
W39CA-D D24 DC LIC	16.0			25	4.0 25	4.0 25

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Interference to BLCDT20090304ADW LIC scenario 2

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	WMDN	D24	DT	LIC	MERIDIAN, MS	BLCDT20090304ADW	
Undesireds:	KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	317.9 km
	WBXA-CD	D24	DC	CP	BIRMINGHAM, AL	BLANK0000035776	217.9
	WHIQ	D24	DT	LIC	HUNTSVILLE, AL	BLANK0000004828	334.4
	WSRE	D24	DT	LIC	PENSACOLA, FL	BLANK0000090765	216.7
	WXTX	D24	DT	LIC	COLUMBUS, GA	BLANK0000064021	358.2
	WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	331.2
	W39CA-D	D24	DC	LIC	FULTON, MS	BLANK0000063965	196.5
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	20490.7	278,227	20394.1	277,828	20309.8	277,503	20273.7 277,101 0.18 0.14

Undesired				Total IX	Unique IX, before	Unique IX, after
KNOE-TV D24 DT APP	44.2			528		36.2 402
WBXA-CD D24 DC CP	4.0			0	0.0 0	0.0 0
WHIQ D24 DT LIC	28.0			30	0.0 0	0.0 0
WSRE D24 DT LIC	68.2			269	48.2 239	44.2 144
WXTX D24 DT LIC	4.0			0	0.0 0	0.0 0
WGMB-TV D24 DT LIC	4.1			31	4.1 31	0.0 0
W39CA-D D24 DC LIC	16.0			25	4.0 25	4.0 25

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Interference to proposal scenario 1  
2.76% interference received

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	
Undesireds:	KSLA	D23	DT	LIC	SHREVEPORT, LA	BLANK0000120697	182.6 km
	KVTN-DT	D24	DT	LIC	PINE BLUFF, AR	BLCDT20071231AFB	259.5
	WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	221.2
	WMDN	D24	DT	CP	MERIDIAN, MS	BLANK0000035927	317.9
	WLPB-TV	D25	DT	CP	BATON ROUGE, LA	BLANK0000035855	218.8
	Service area		Terrain-limited		IX-free	Percent IX	
	46850.1	767,416	46673.9	765,942	44894.7	744,818	3.81 2.76

Undesired				Total IX	Unique IX	Prct Unique IX
KSLA D23 DT LIC	229.4			4,123	189.2 3,424	0.41 0.45
KVTN-DT D24 DT LIC	291.8			2,163	255.6 1,851	0.55 0.24
WGMB-TV D24 DT LIC	1269.8			15,422	1165.1 13,558	2.50 1.77
WMDN D24 DT CP	129.0			1,592	32.4 122	0.07 0.02

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Interference to proposal scenario 2  
2.76% interference received

**Table 1 KNOE-TV TVStudy Analysis of Proposal**  
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	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KNOE-TV	D24	DT	APP	MONROE, LA	KNOE-TV 24 PRM	
Undesireds:	KSLA	D23	DT	LIC	SHREVEPORT, LA	BLANK0000120697	182.6 km
	KVTN-DT	D24	DT	LIC	PINE BLUFF, AR	BLCDT20071231AFB	259.5
	WGMB-TV	D24	DT	LIC	BATON ROUGE, LA	BLANK0000113571	221.2
	WMDN	D24	DT	LIC	MERIDIAN, MS	BLCDT20090304ADW	317.9
	WLPB-TV	D25	DT	CP	BATON ROUGE, LA	BLANK0000035855	218.8

Service area	Terrain-limited	IX-free	Percent IX
46850.1	767,416	44906.9	3.79

Undesired	Total IX	Unique IX	Prct Unique IX
KSLA D23 DT LIC	229.4	4,123	189.2
KVTN-DT D24 DT LIC	291.8	2,163	255.6
WGMB-TV D24 DT LIC	1269.8	15,422	1181.1
WMDN D24 DT LIC	100.8	1,526	20.2